

**THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:	
TYREE J. MOBLEY	:	BK. No. 19-15764 JKF
Debtor	:	
		Chapter No. 13
FREEDOM MORTGAGE CORPORATION		
Movant		
v.		
TYREE J. MOBLEY		
Respondent		11 U.S.C. §362

NOTICE OF FORBEARANCE DUE TO THE COVID-19 PANDEMIC

Now comes **FREEDOM MORTGAGE CORPORATION** (“Creditor”), by and through undersigned counsel, and hereby submits Notice of Forbearance to the Court based on the Debtor’s request for mortgage payment forbearance due to hardship caused by the COVID-19 pandemic.

The Debtor contacted Creditor requesting a forbearance period of 6 months and has elected to not tender mortgage payments to Creditor that would come due on the mortgage starting June 1, 2020 through November 30, 2020. Creditor has granted the Debtor’s forbearance request. To the extent the forbearance period is not extended for an additional period of time as provided under the CARES Act, Debtor will resume mortgage payments beginning December 1, 2020. Near the end of the forbearance period, debtor, through counsel, will need to engage with creditor on a solution for payments suspended during the forbearance.

Creditor does not waive any rights to collect the payments that come due during the forbearance period. Furthermore, Creditor does not waive its rights under other applicable non-bankruptcy laws and regulations, including, but not limited to, RESPA, and the right to collect on any post-petition escrow shortage.

Creditor does not waive its rights to seek relief from the automatic stay for other reasons other than non-payment of the Mortgage, including, but not limited to, a lapse in insurance coverage or payment of property taxes.

/s/ Jerome Blank, Esquire

Jerome Blank, Esq., Id. No.49736

Phelan Hallinan Diamond & Jones, LLP

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May 5, 2020

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CERTIFICATE OF SERVICE

I hereby certify that service upon all interested parties, indicated below was made by sending true and correct copies of the Notice of Forbearance by electronic means on May 5, 2020.

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200 CHESTNUT STREET
SUITE 502
PHILADELPHIA, PA 19106

/s/ Jerome Blank, Esquire

Jerome Blank, Esq., Id. No.49736

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